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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

AMERICAN FEDERATION OF  
GOVERNMENT EMPLOYEES, AFL-CIO, et  
al.,

Case No. 3:25-cv-03698-SI

## **DECLARATION OF CAITLIN PRENDIVILLE**

**Plaintiffs,**

V.

DONALD J. TRUMP, in his official capacity  
as President of the United States, et al..

### Defendants.

## **DECLARATION OF CAITLIN PRENDIVILLE**

I, Caitlin Prendiville, declare as follows:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.

2. I am the Research Director for Service Employees International Union (SEIU) Local 1021, a local affiliate of SEIU. I have been employed by SEIU Local 1021 for nearly 14 years. My office is located in Oakland, California.

3. SEIU Local 1021 represents over 65,000 workers employed by local governments, non-profit agencies, healthcare programs, housing authorities, and schools and higher education institutions throughout Northern California. Our members include registered nurses, maintenance and clerical workers, public transit workers, Head Start workers, housekeepers, eligibility workers, librarians, court reporters, school crossing guards, park rangers, dieticians, animal control assistant supervisors, adjunct faculty, and many more. We represent workers employed by 12 counties, including the City and County of San Francisco, Alameda County, Contra Costa County, Del Norte County, Mendocino County, Napa County, and Sonoma County. We also represent workers employed by 30 cities and towns, including the City of Albany, the City of Berkeley, the City of El Cerrito, the City of Emeryville, the City of Fort Bragg, the City of Hayward, the City of Napa, the City of Novato, the City of Oakland, the City of Piedmont, the City of Richmond, the City of Rohnert Park, the City of San Rafael, the City of San Ramon, the City of Santa Rosa, the City of Sausalito, the City of Sonoma, City of Union City, the Town of Corte Madera, the Town of Fairfax, the Town of San Anselmo, and the Town of Tiburon. The vast majority, approximately 43,000 SEIU Local 1021 members, work in the San Francisco/Oakland bay area.

4. SEIU Local 1021's mission is to ensure that all workers and their families have a voice in our Union, as well as their workplace, government, and communities. We envision a society where all workers and their families live and work in dignity and respect. As the

1 exclusive representative for our bargaining units, SEIU Local 1021 supports members in  
2 negotiating strong collective bargaining agreements (CBAs) with their employers; filing  
3 grievances and pursuing arbitration to enforce these CBAs; and providing other support,  
4 assistance, and resources to bargaining unit employees.

5        5. In my capacity as the SEIU Local 1021 Research Director, I oversee a wide range  
6 of research for union campaigns, collective bargaining, and local and state public policy. As a  
7 result, I am familiar with the broad range of jobs performed by SEIU Local 1021 members.

8        6. I have seen reporting on the Trump administration's directive to federal agencies  
9 to lay off huge numbers of employees through reductions in force (RIF), close regional offices  
10 and agency departments, and reassign programs and services from one agency to another. We are  
11 already experiencing and expect to experience more devastating, irreversible ripple effects for  
12 frontline city and county workers, like SEIU Local 1021 members, who provide crucial health,  
13 safety, and welfare services to the public, as described below.

**A. Imperiling Access to Early Education and Healthy Childhood Development.**

15        7. Across Northern California, SEIU Local 1021 represents Head Start workers who  
16 provide early learning and offer developmental support, nutrition, and stability for families who  
17 need it most. As the federal government's own website explains, "Head Start programs prepare  
18 America's most vulnerable young children to succeed in school and in life beyond school. To  
19 achieve this, Head Start programs deliver services to children and families in core areas of early  
20 learning, health, and family well-being while engaging parents as partners every step of the  
21 way."<sup>1</sup> Head Start is administered by the Department of Health and Human Services (HHS),  
22 through the Administration for Children and Families (ACF).

23        8.      Based on news reporting, my understanding is that the Secretary of HHS intends  
24 to lay off 10,000 workers, aiming to downsize the agency by 62,000 positions overall. *See*

<sup>1</sup> Head Start Programs, HeadStart.gov, available at <https://headstart.gov/programs/article/head-start-programs>.

1 Exhibit A (PBS News).<sup>2</sup> These layoffs have led to the closure of five Office of Head Start (OHS)  
 2 regional offices, including our Region 9 office in San Francisco. SEIU Local 1021 members and  
 3 their employers rely on these regional offices to provide support to local Head Start programs,  
 4 including timely grant processing, social service supports, training, and technical guidance and  
 5 assistance.

6       9. Media reports indicate that many Head Start programs are already seeing delays  
 7 in payments due to HHS layoffs and the regional office closures. *See Exhibit B (L.A. Times).*<sup>3</sup>  
 8 We expect these problems not only to persist but to worsen. When grant applications are not  
 9 processed in a timely manner, Head Start programs cannot make payroll. When they cannot  
 10 make payroll, workers are laid off, centers close temporarily or indefinitely, and students and  
 11 their parents suffer without sufficiently accessible child care and educational access. This is a  
 12 huge threat to SEIU Local 1021 members and our communities.

13     10. SEIU Local 1021 represents workers employed by approximately half a dozen  
 14 Head Start programs. Prior to March 31, 2025, county employees worked with federal staff at  
 15 OHS's regional office in San Francisco to consult and receive guidance and direction for  
 16 submitting applications and re-applications for Head Start services funding. In one instance, a re-  
 17 application for funding has been completed and submitted but it is unclear how or when it will be  
 18 processed due to the closure of the San Francisco regional office. Given the uncertainty of who  
 19 at OHS will process the re-application, and when the renewal grant will be approved, there is a  
 20 significant risk that SEIU Local 1021 members will be laid off and large numbers of children and  
 21 their parents will be left without critical services.

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 23  
 24     2 Amanda Seitz, *Health and Human Services to lay off 10,000 workers, close agencies in major restructuring*, PBS  
 25 News (Mar. 27, 2025), available at <https://www.pbs.org/newshour/politics/department-of-health-and-human-services-to-cut-20000-positions-public-health-agencies-hit-hardest>.

26     3 Jenny Gold and Kate Sequeira, *With Head Start in jeopardy, Trump administration threatens child care for 800,000 kids*, L.A. Times (Apr. 23, 2025), available at <https://www.latimes.com/california/story/2025-04-23/layoffs-funding-cuts-hit-head-start-imperiling-child-care>.

1       11. In addition, an understaffed HHS will not be able to fulfill its investigatory duties  
 2 or to enforce its new rule, which updates performance standards for Head Start programs. The  
 3 new rule provides clear federal requirements for wages and benefits to support Head Start  
 4 workers, better integrates mental health across Head Start programs, and improves processes to  
 5 support child health safety and enhance family engagement services.<sup>4</sup> Failing to enforce  
 6 federally-mandated requirements, including lead remediation and abatement along with health or  
 7 safety incident reporting obligations, will likewise harm both Head Start workers and students.

8 **B. Undermining the Provision of Substance Abuse Prevention and Mental Health  
 9 Programs and Services.**

10     12. SEIU Local 1021 members employed by several counties, including the City and  
 11 County of San Francisco, as well as nonprofits funded by local, state, and federal governments  
 12 deliver vital services to area residents, including substance abuse prevention, outpatient drug  
 13 treatment, and mental health counseling. Many are complex gender-specific, culturally-sensitive,  
 14 and in-language service programs. Our members include mental health therapists, certified  
 15 substance abuse counselors, child welfare services care coordinators, client advocates, clinicians,  
 16 cooks, detox coordinators, case managers, desk clerks, billing clerks, call center agents, care  
 17 coordinators, and case managers,

18     13. In addition to the mass layoffs at HHS, the administration is shutting down the  
 19 HHS Substance Abuse and Mental Health Services Administration (SAMHSA). *See Exhibit A.*  
 20 SAMHSA funds behavioral health for the uninsured, collects data, publishes best practices on  
 21 substance abuse prevention and mental health, and oversees the national suicide and crisis  
 22 lifeline hotline.

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23  
 24  
 25  
 26     <sup>4</sup> Performance Standards Information Center, HeadStart.gov, available at  
 27 https://www.headstart.gov/policy/article/performance-standards-information-center.  
 28

14. SEIU Local 1021 members rely on SAMHSA data and resources. For instance, SAMHSA has issued a guide about addressing burnout in the behavioral health workforce through organizational strategies and produces an annual national survey on drug use and health.

15. Even if HHS attempts to consolidate SAMHSA into another office, the damage will have been done. The depletion of staff, the seemingly indiscriminate termination of SAMHSA employees without regard for experience or expertise, and the dismantling of an entire department will irreparably harm the provision of programs and services. It will erode oversight, slow grant approvals and funding disbursements, and reduce capacity to provide high quality guidance and resources.

16. The fallout will impact the services SEIU Local 1021 members provide and area residents receive. Delayed grant review, awards, and disbursements interfere with the provision of services, payroll, and hiring and staffing determinations. Brain drain from layoffs detrimentally impacts HHS's ability to support behavioral health and addiction treatment research and develop evidence-based materials and best practices, which workers rely on to provide quality care. A barebones or overextended replacement sub-agency (subsuming five offices into one) will also likely have reduced oversight capacity, which hurts both workers and clients/consumers.

### C. Threatening Affordable Healthcare Programs and Services.

17. SEIU Local 1021 represents hospital eligibility workers who are assigned to screen and process applicants who are eligible for state and federal programs, including Medi-Cal—California’s Medicaid program—and Medicare. HHS, through the Centers for Medicare and Medicaid Services (CMS), regulates Medicaid and Medicare. The Social Security Administration (SSA), meanwhile, oversees Medicare eligibility and enrollment.

18. SEIU-represented hospital eligibility workers interview patients, their relatives, and others to obtain financial and demographic information and determine eligibility under

1 various federal, state, or county programs. The applications for Medi-Cal and Medicare require  
 2 the provision of social security numbers from all applicants who have them.

3       19. In addition to the HHS layoffs referenced above, I have read reports that the SSA  
 4 is currently struggling to maintain normal operations. *See Exhibit C (NPR).*<sup>5</sup> I have also read that  
 5 the administration plans to terminate as many as 7,000 SSA employees and close and/or suspend  
 6 in-person services at SSA offices. *See Exhibit C (NPR)* and *Exhibit D (MarketWatch).*<sup>6</sup> These  
 7 terminations will undoubtedly impact SSA's services by delaying application processing,  
 8 increasing wait times for in-person appointments, and making it more difficult for people to get  
 9 help if they do not have internet access.

10      20. Applications for Medi-Cal and Medicare benefits can be denied because of  
 11 problems with SSA documentation, such as missing or incorrect information or name  
 12 discrepancies. When that happens, applicants must contact the SSA to, for example, get a new  
 13 social security card. Long delays at the SSA in responding to these inquiries and correcting these  
 14 issues will invariably place more strain on eligibility workers, who will need to field additional  
 15 inquiries from California residents who are otherwise qualified for Medi-Cal and Medicare and  
 16 will delay the provision of critical benefits.

17      21. SEIU Local 1021 also represents nearly 3,500 registered nurses, most of whom  
 18 work for the City and County of San Francisco or the Alameda Health System (in Alameda  
 19 County). Many of the patients to whom these registered nurses provide care are Medi-Cal and  
 20 Medicare recipients. Indeed, both hospital systems rely heavily on Medi-Cal and Medicare. The  
 21 majority of San Francisco General Hospital's patients are Medi-Cal and Medicare recipients, and  
 22 payments from Medi-Cal and Medicare account for hundreds of million dollars in revenue

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23  
 24      <sup>5</sup> Ashley Lopez, *Employee cuts at Social Security are leaving remaining workers struggling to keep up*, NPR (Apr.  
 25           26, 2025), available at <https://www.npr.org/2025/04/26/nx-s1-5368480/social-security-workforce-cuts>.

25      <sup>6</sup> See also Alessandra Malito, *Social Security says it's only closing one field office. So what about the 22 leases that*  
 26           *were terminated*, MarketWatch (Mar. 29, 2025), available at <https://www.marketwatch.com/story/social-security-says-its-only-closing-one-field-office-so-what-about-the-22-leases-that-were-terminated-87e1a554>; Closures or  
 27           Delays Affecting In-Person Service, SSA, available at <https://www.ssa.gov/agency/emergency/> (listing 13 locations).

annually.<sup>7</sup> The same is true of the hospitals in the Alameda Health System, for which Medi-Cal and Medicare are the majority payers.<sup>8</sup>

3           22. Delays in the processing of Medi-Cal and Medicare applications caused by an  
4 understaffed SSA will immediately harm these hospital systems, which will likely see fewer  
5 patients. Attendant impacts on revenue will threaten SEIU Local 1021's members, who may lose  
6 their jobs. And, moreover, it will hurt residents who are otherwise qualified for these programs.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed April 29, 2025, in Oakland, California.

Caitlin Prendiville

<sup>7</sup> Priscilla Chan & Mark Zuckerberg San Francisco General Hospital & Trauma Center Hospital Profile, Cal. Dep't of Health Care Access and Info., available at <https://hcai.ca.gov/facility/priscilla-chan-mark-zuckerberg-san-francisco-general-hospital-trauma-center/>

<sup>8</sup> San Leandro Hospital, Cal. Dep’t of Health Care Access and Info., available at <https://hcai.ca.gov/facility/san-leandro-hospital/>; Highland Hospital, Cal. Dep’t of Health Care Access and Info., available at <https://hcai.ca.gov/facility/highland-hospital/>; Fairmont Hospital, Cal. Dep’t of Health Care Access and Info., available at <https://hcai.ca.gov/facility/fairmont-hospital/>; Alameda Hospital, Cal. Dep’t of Health Care Access and Info., available at <https://hcai.ca.gov/facility/alameda-hospital/>; John George Psychiatric Hospital, Cal. Dep’t of Health Care Access and Info., available at <https://hcai.ca.gov/facility/jhn-george-psychiatric-hospital/>.

# Exhibit A



# Health and Human Services to lay off 10,000 workers, close agencies in major restructuring

Politics Mar 27, 2025 10:22 AM EDT

WASHINGTON (AP) — In a major overhaul, the U.S. Department of Health and Human Services will lay off 10,000 workers and shut down entire agencies, including ones that oversee billions of dollars in funds for addiction services and community health centers across the country.

Health Secretary Robert F. Kennedy Jr. criticized the department he oversees as an inefficient “sprawling bureaucracy” in a video announcing the restructuring Thursday. He faulted the department’s 82,000 workers for a decline in Americans’ health.

## READ MORE: A closer look at who relies on Medicaid

“I want to promise you now that we’re going to do more with less,” Kennedy said in the video, posted to social media.

The restructuring plan caps weeks of tumult at the nation’s top health department, which has been embroiled in rumors of mass firings, the revocation of \$11 billion in public health funding for cities and counties, a tepid response to a measles outbreak, and controversial remarks about vaccines from its new leader.

Still, Kennedy said a “painful period” lies ahead for HHS, which is responsible for monitoring infectious diseases, inspecting foods and hospitals, and overseeing health insurance programs for nearly half the country.

Overall, the department will downsize to 62,000 positions, losing nearly a quarter of its staff — 10,000 jobs through layoffs and another 10,000 workers who took early retirement and voluntary separation offers encouraged by President Donald Trump’s administration.

The staffing cuts were first reported by The Wall Street Journal.

Public health experts, doctors, current and former HHS workers and congressional Democrats quickly panned Kennedy’s plans, warning they could have untold consequences for millions of people.

“These staff cuts endanger public health and food safety,” said Brian Ronholm, director of food policy at Consumer Reports, in a statement. “They raise serious concerns that the administration’s pledge to make Americans healthy again could become nothing more than an empty promise.”

But Kennedy, in announcing the restructuring, blasted HHS for failing to improve Americans’ lifespans and not doing enough to **drive down chronic disease and cancer rates**.

“All of that money,” Kennedy said of the department’s \$1.7 trillion yearly budget, “has failed to improve the health of Americans.”

Cancer death rates have dropped 34% over the past two decades, translating to 4.5 million deaths avoided, according to the American Cancer Society. That’s largely due to smoking cessation, the development of better treatments — many funded by the National Institutes of Health, including groundbreaking immunotherapy — and earlier detection.

The reorganization plan also underscores Kennedy's push to take more control of the public health agencies — the NIH, the Food and Drug Administration, and the Centers for Disease Control and Prevention — which have traditionally operated with a level of autonomy from the health secretary. Under the plan, external communications, procurement, information technology and human resources will be centralized under HHS.

### FDA and CDC face the deepest cuts

Federal health workers — stationed across the country at agencies including at the NIH and FDA, both in Maryland — described shock, fear and anxiety rippling through their offices Thursday. Workers were not given advance notice of the cuts, several told The Associated Press, and many remained uncertain about whether their jobs were on the chopping block.

"It's incredibly difficult and frustrating and upsetting to not really know where we stand while we're trying to keep doing the work," said an FDA staffer who spoke on condition of anonymity out of fear of retaliation. "We're being villainized and handicapped and have this guillotine just hanging over our necks."

HHS on Thursday provided a breakdown of some of the cuts.

— 3,500 jobs at the FDA, which inspects and sets safety standards for medications, medical devices and foods.

— 2,400 jobs at the CDC, which monitors for infectious disease outbreaks and works with public health agencies nationwide.

— 1,200 jobs at the NIH, the world's leading public health research arm.

— 300 jobs at the Centers for Medicare and Medicaid Services, which oversees the Affordable Care Act marketplace, Medicare and Medicaid.

HHS said it anticipates the changes will save \$1.8 billion per year but didn't give a breakdown or other details.

The cuts and consolidation go far deeper than anyone expected, an NIH employee said.

"We're all pretty devastated," said the staff member, who spoke on condition of anonymity for fear of retaliation. "We don't know what this means for public health."

Union leaders for CDC workers in Atlanta said they received notice from HHS on Thursday morning that reductions will focus on administrative positions including human resources, finance, procurement and information technology.

At CMS, where cuts focus on workers who troubleshoot problems that arise for Medicare beneficiaries and Affordable Care Act enrollees, the result will be the "lowest customer service standards" for thousands of cases, said Jeffrey Grant, a former deputy director at the agency who resigned last month.

### Kennedy plans to shutter some agencies, even those created by Congress

Beyond losing workers, Kennedy said he will shut down entire agencies, some of which were established by Congress decades ago. Several will be folded into a new Administration for a Healthy America, he said.

Those include the Health Resources and Services Administration, which oversees and provides funding for hundreds of community health centers around the country, as well as the Substance Abuse and Mental Health Services Administration, which funds clinics and oversees the national 988 hotline. Both agencies pump billions of dollars into on-the-ground work in local communities.

SAMHSA was created by Congress in 1992, so closing it is illegal and raises questions about Kennedy's commitment to treating addiction and mental health, said Keith Humphreys, a Stanford University addiction researcher.

"Burying the agency in an administrative blob with no clear purpose is not the way to highlight the problem or coordinate a response," Humphreys said.

The Administration for Healthy America will focus on maternal and child health, environmental health and HIV/AIDS work, HHS said.

The Administration for Strategic Preparedness and Response, created by a law signed by then-Republican President George W. Bush and responsible for maintaining the national stockpile that was quickly drained during the COVID-19 pandemic, will also be eliminated and moved into the CDC.

Republican Sen. Mike Rounds of South Dakota said the ramifications of Kennedy's plans for HHS are unclear.

"We'll just wait and see what it is, and then we'll go back and try to fix if there is something broken," Rounds said. "That's the approach we've taken so far."

But Democratic Sen. Patty Murray of Washington warned that the fallout is clear.

"It does not take a genius to understand that pushing out 20,000 workers at our preeminent health agencies won't make Americans healthier," Murray said in a statement. "It'll just mean fewer health services for our communities, more opportunities for disease to spread, and longer waits for lifesaving treatments and cures."

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Associated Press writers Matthew Perrone, Lauran Neergaard and Kevin Freking in Washington; JoNel Aleccia in Temecula, Calif.; Carla K. Johnson in Seattle; and Mike Stobbe in New York contributed.

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Follow the AP's coverage of the U.S. Department of Health and Human Services at <https://apnews.com/hub/us-department-of-health-and-human-services>.

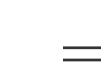
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By — Amanda Seitz, Associated Press

# Exhibit B

[Trump administration >](#)[Immigration](#)[Environment](#)[Economy](#)

CALIFORNIA

# With Head Start in jeopardy, Trump administration threatens child care for 800,000 kids



Yolanda Rubio, parent and teachers aid, plays with a child in the Early Head Start program at Pacific Clinics Head Start in Pasadena.

By Jenny Gold and Kate Sequeira  
Photography by Allen J. Schaben

Funding cuts to Head Start, imperiling child care in California - Los Angeles Times  
April 23, 2025 3 AM PT

- Head Start has faced a series of escalating threats under the Trump administration.
- A recent administration budget proposal calls for a complete termination of the 60-year-old program.
- Eliminating the program would cut child care and supportive services for about 80,000 young children in California.

Since President Trump took office in January, Head Start centers have been unnerved by an escalating series of threats, including, most recently, total annihilation.

An end to the historic federal early childhood program would leave about 800,000 low-income children across the U.S. without access to child care, medical screenings, and nutritious food — including about 80,000 children from birth to age 5 in California.

First came the executive order to temporarily freeze all federal financial aid in January, when Head Start staff suddenly couldn't access the funds they had been promised. Although the memo was rescinded days later, dozens of centers reported that they couldn't access their funds for weeks; unable to meet payroll, some were forced to shutter for a few days.

On Feb. 14, scores of federal staffers were laid off at Health and Human Services' Office of Head Start in Washington, D.C. And on April 1st, the administration announced that five of the 12 regional offices managing relationships with Head Start grantees would be closed immediately and all employees laid off, including Region 9, which covers four states, including California.



A teacher reads a child a book at Pacific Clinics Head Start in Pasadena.

Now the very existence of the program is imperiled: A leaked draft of the administration's budget proposal for the Department of Health and Human Services would defund Head Start and phase the program out by 2026, a move that would slash a critical safety net for families that otherwise could not afford child care and the other comprehensive services they receive.

In addition, the draft budget calls for terminating an array of HHS initiatives dedicated to helping families with newborns and young children. Programs slated for elimination include Healthy Start, which is dedicated to healthy pregnancies and births, newborn screenings for heritable disorders and hearing, infant and early childhood mental health, childhood lead poisoning, family planning and drowning prevention.

Funding cuts to Head Start, imperiling child care in California - Los Angeles Times

While the document does not represent a final decision, it will serve as a guidepost for Trump's 2026 budget, which must then be approved by Congress. The White House referred The Times to the Office of Management and Budget for comment, where the communications director, Rachel Cauley, did not deny the contents of the memo. "No final funding decisions have been made," Cauley said.

The plan, if approved, would represent a fundamental retraction of the federal government's longtime role in helping families with young children have a healthy start in the critical early years of life, said Elisabeth Wright Burak, who studies child health policy at the Georgetown University McCourt School of Public Policy's Center for Children and Families.

"That's really unprecedented damage to the social safety net for families," said Burak. Alongside the proposed mass cuts to Medicaid, the federal-state health insurance program for low-income Americans, she said, "I would worry it would do irreparable damage."

"It's just terrifying on every level," said Stacy Scarbrough, who runs the Early Head Start program at Venice Family Clinic, which serves 376 pregnant women, infants and toddlers, and was the past president of the Head Start California Assn. "It's terrifying for the community, it's terrifying for the staff, it's terrifying for the families," and it's just terrifying for the future."

The proposed actions are also antithetical to Trump's campaign promise to be pro-high-cost child-care industry, especially the proposal to eliminate Head Start, early family, and Vice President JD Vance's pledge to shore up the nation's fragile and childhood experts said.

Jessica Lepre Rodriguez, left, and Karen Lockett, right, dance with children in the Early Head Start program at Pacific Clinics Early Head Start Center in Pasadena. Pacific Clinics in L.A. County has seven centers serving about 500 kids.





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[\*\*Find more of our coverage here\*\*](#)

On Friday, Venice Family Clinic sent out an email to parents, letting them know of the possible closures. For families living on the brink, this news is “very scary,” said Scarborough: Missing work could cost them their job, and eventually their home.

The email asks the families to start writing letters, sharing their stories, and calling their members of Congress to plead for continued funding. Head Start centers have fought for their lives in the past — including against a plan to block grant the program in the 1990s — and they know how to fight, said Scarborough. “I don’t know if that’s really going to work. But it’s what we have to do.”

## An existential threat from Washington



A 1965 image of a Head Start summer program in Washington. (Sam Myers/Associated Press)

Head Start was founded in 1965 as part of President Lyndon B. Johnson's "War on Poverty," and has served more than 40 million children over the last six decades. The program — which is celebrating its 60th birthday this year — was set to receive more than \$12 billion in funding for the current year. California alone was slated to receive about \$1.6 billion in grants to centers that employ 26,000 workers.

Funding cuts to Head Start, imperiling child care in California - Los Angeles Times

The program has come under attack several times over the decades, most recently during the presidential election last year, when [Project 2025](#) called for the program to be terminated on the grounds that it is “fraught with scandal and abuse” and has “little or no long-term academic value for children.”

Russell Vought, one of Project 2025’s principal architects, now serves as the director of the Office of Management and Budget, which authored the budget draft.



CALIFORNIA

## How Trump’s fight with California could harm poor students who rely on school meals

April 3, 2025

“This elimination is consistent with the Administration’s goals of returning education to the States and increasing parental choice,” the Office of Management and Budget wrote in the draft budget, which is the product of discussions between OMB and Health and Human Services. “The Federal government should not be in the business of mandating curriculum, locations, and performance standards for any form of education.”

The Head Start program, however, does not mandate a particular curriculum at centers, and it is one of several child-care programs offered to low-income families. In California, families can also access state preschools or vouchers for a program of their choosing, which includes family child-care homes and money to help pay for care from a family member, friend or neighbor.

[Decades of research](#) point to the positive impacts of Head Start on children, including improved cognitive and social-emotional development, though a federal study found that some of these effects fade out over time.

## Bipartisan support for Head Start may be wavering

Funding cuts to Head Start, imperiling child care in California - Los Angeles Times

Head Start has had longtime support from Democrats and Republicans in Congress. Last year, 33 House Republicans [signed a letter urging](#) the Appropriations committee “to fund Head Start at the highest level the Subcommittee deems possible.” And many Republican members announce Head Start grants to their district as a point of pride in news releases, [including Rep. David Valadao](#), whose San Joaquin Valley district received [\\$50.3 million in funding](#) for the 2023-24 school year.

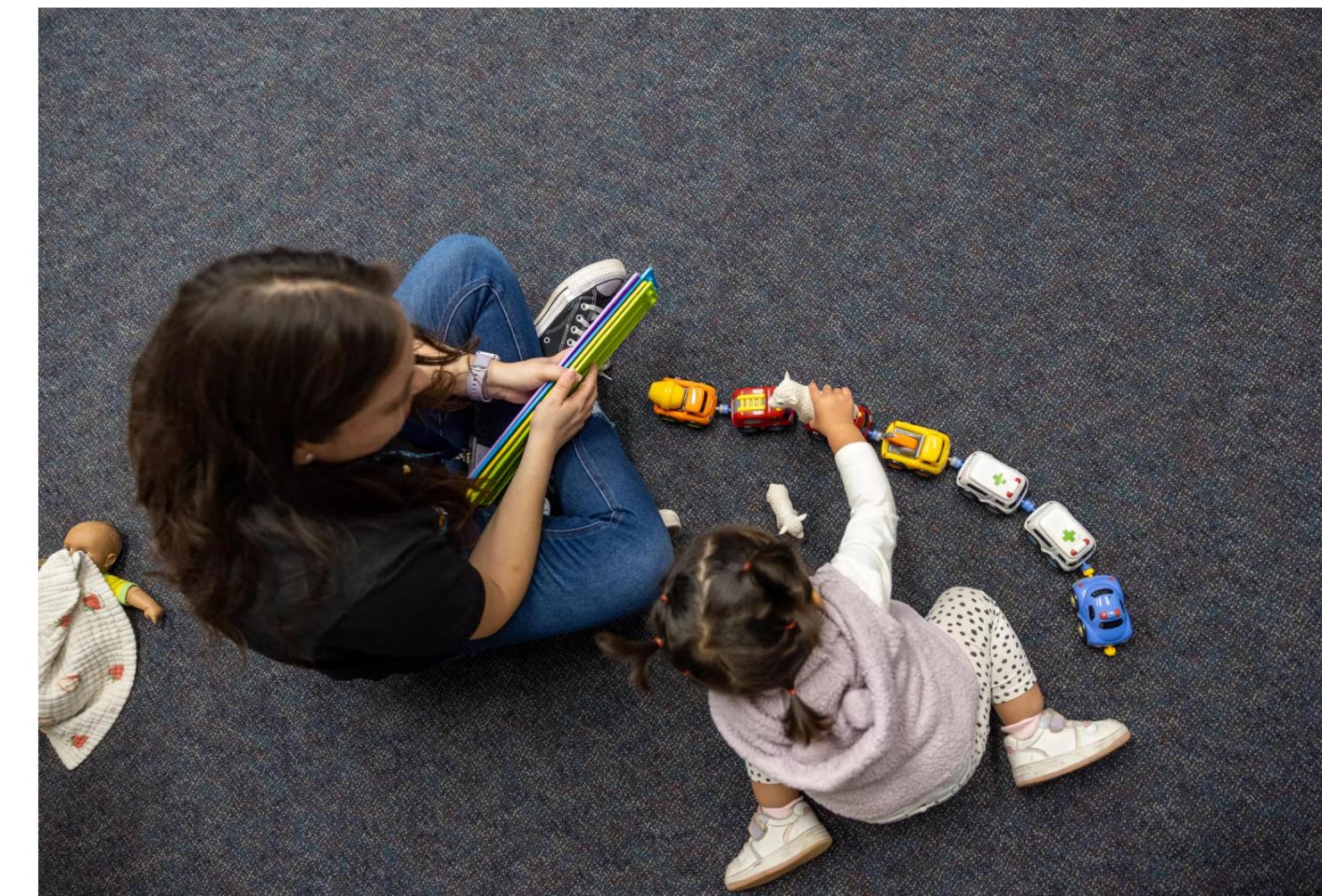
“The effort right now is to give those bipartisan members — including many Republican members — the tools they need to push back,” said Sarah Rittling, executive director of the nonpartisan First Five Years Fund, which lobbies Congress on early childhood education.

The stark political divide and vast appetite for cost reduction this year in Washington, however, mean it’s unclear how many Republicans will be willing to pledge their support for Head Start.

Trump has targeted Head Start’s funding before, albeit unsuccessfully. In his 2018 presidential budget, he proposed to cut funding to the Head Start program by \$85 million and in 2019, by \$29 billion over 10 years; neither proposal passed. Instead, Congress decided to increase funding to the program in both budget years.

This time, the threats are far more serious. “We’ve never had the adversary in the White House that we have today,” said Ed Condon, executive director of the Region 9 Head Start Assn., which represents four states, including California.

No members of the California Republican delegation to the House signed last year’s letter in support of Head Start.



Viviana Banuelos, teacher, left, plays with a child in the Early Head Start program in Pasadena. Head Start serves 800,000 low-income children across the country, including 75,000 in California.

“Especially given the dire financial condition of the federal government, the enormous cost of this program and its questionable effectiveness, it ought to be suspended until rigorously reviewed and reauthorized by Congress,” Rep. Tom McClintock (R-Elk Grove) said in a statement to The Times this week.

The Head Start program has long been a target among conservative thinkers at the Heritage Foundation and the Cato Institute, who say the federal government should not be involved in child-care programming.

“The country is just too big and too diverse for bureaucrats in Washington, D.C., to really know what education should look like in random towns or cities around America,” said Colleen Hroncich, an education policy analyst at Cato, who points to

federal research that found the positive effects of the Head Start program [fade out by third grade.](#)

“Something can sound really nice as a concept, but if it doesn’t actually do what it was aiming to do, then people should reevaluate it,” she said.

Head Start should be phased out slowly, she said, to allow states and churches to fill the affordable child-care gap left behind.

Many Head Start programs say delays in payments have grown worse since federal workers in the regional offices were laid off.

Administrators of programs that are supposed to begin their next fiscal year May 1 say they have not received the next round of funding.

So far this year, there has been a nearly \$1-billion shortfall in Head Start funding compared with the same period in 2024, [according to an Associated Press report.](#)

“What I worry about with this administration is it’s like a game of whack-a-mole, said Katie Hamm, who served as the deputy assistant secretary for early childhood development during the Biden administration. “There’s a funding issue on Monday, and then some programs close, and then the funding starts to flow, and then there’s another issue ... at some point, this death by a thousand cuts will be effective.”

## The effect on child care in California



Jessica Lepe Rodriguez reads to children in the Early Head Start program at Pacific Clinics Early Head Start Center in Pasadena.

To be eligible for the Head Start program, families must earn less than the federal poverty level — \$26,650 per year for a family of three — or be homeless, disabled or part of the foster system, making them among the most vulnerable in the state.

The program has been a lifeline for Patricia Palafox, whose 2-year-old daughter, Ennovy, is currently enrolled in the Early Head Start program at Pacific Clinics Head Start in Pasadena, and whose 6-year-old son also attended the program. “As a single mom, I don’t have anyone to take care of them if I didn’t have this.”

The program not only provides the child care she needs to go to work full time and support her family, but also gives her daughter diapers and healthy meals. Because of Head Start, she said, her daughter can count in English and Spanish, excitedly sings songs like “Happy Birthday” and interacts with other kids.

If the program shuts down, Palafox said it will upend her daughter's learning — and their lives. And it would come after they already faced disruption in January after the Eaton fire burned down Pacific Clinics' Early Head Start location in Altadena, moving her daughter to the one she attends now.

Jessica Lepe Rodriguez is a single mother who depends on the program not only for child care, but also for her income as one of the many Head Start parents who also serve as a classroom aide. If the Pacific Clinics Head Start program where she works closes, she'd likely have to move in with family to stay afloat.



CALIFORNIA

## Can a baby struggle with their mental health? How this hospital is helping L.A.'s youngest

April 15, 2025

Pacific Clinics Head Start, which serves 500 children, is focused on turning the skills they've honed to advocate for their families toward advocating for the program's very survival.

"These are young families fighting so many battles trying to work and find transportation and housing and buy food. They're up against so much," said Nina Paddock, an administrator at Pacific Clinics Head Start. "That's what keeps me up, but it's also what keeps me doing it."

*This article is part of The Times' early childhood education initiative, focusing on the learning and development of California children from birth to age 5. For more information about the initiative and its philanthropic funders, go to [latimes.com/earlyed](https://latimes.com/earlyed).*

### More to Read

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April 26, 2025



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## Will Trump kill programs that help drug users? L.A. harm reduction groups await fate

March 31, 2025



Jenny Gold

Jenny Gold covers early childhood development and education for the Los Angeles Times. Before joining The Times in 2023, she spent nearly 14 years covering healthcare for radio and print as a senior correspondent at Kaiser Health News. Her stories have appeared in the New York Times, the Washington Post, the Atlantic, NPR, Reveal and Marketplace, among others. A Berkeley native, she is a graduate of Brown University and was previously a Kroc fellow at NPR.



Kate Sequeira

Kate Sequeira is the audience editor for the Los Angeles Times early childhood education initiative. She worked previously as a production specialist for The Times' Reading by 9 literacy program.



Allen J. Schaben

Los Angeles Times staff photographer Allen J. Schaben is an award-winning journalist capturing a wide range of images over the past 34 years. Before joining The Times, he honed his craft at the Detroit Free Press, Dallas Morning News, Wichita Eagle and Connecticut Post. Schaben earned his bachelor's degree in journalism at the University of Nebraska-Lincoln in 1993.

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# Exhibit C



DONATE

## POLITICS

# Employee cuts at Social Security are leaving remaining workers struggling to keep up

APRIL 26, 2025 · 5:00 AM ET

HEARD ON ALL THINGS CONSIDERED



Ashley Lopez

[3-Minute Listen](#)[PLAYLIST](#)

A Social Security Administration office is seen on March 6 in Nashville, Tenn.

George Walker IV/AP

Jessica LaPointe has worked at a Social Security field office in Madison, Wis., for the past 16 years. And she says right now, the work is harder than ever.

LaPointe says disruptions prompted by the Trump administration's efforts to make deep cuts in the federal government workforce have left many remaining Social Security employees "burned out ... and overwhelmed."

Field offices are the public-facing branch of a sprawling agency that provides retirement and anti-poverty benefits to 73 million Americans.

"We really feel the brunt of the public that we serve and the chaos and confusion surrounding Social Security and its impact on them," said LaPointe, who's president of a local chapter of the American Federation of Government Employees (AFGE), which represents 25,000 field office workers.

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Sponsor Message



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The Social Security Administration (SSA) has laid out plans to slash about 12% of its overall workforce, or 7,000 jobs.

Rich Couture, a spokesman for AFGE SSA's General Committee, says more than 2,500 employees at the agency have taken an offered buyout, and that many of the workers who have left were in critical roles — including those local field offices.

"That's the primary point of contact, other than the 1-800 number, that the American people have with Social Security," he said. "They take care of

enumeration issues with respect to Social Security cards, handle retirement, disability survivor claims, interviews and processing, among other workloads."

Couture says the agency has lost about 2,000 employees specifically from the field offices through the federal government's buyout program.

These losses have disproportionately affected certain local offices. Couture told NPR that there are about 40 field offices that have lost at least 25% of their staff so far, and others, such as offices in Nevada, Mo., and Alexandria, Minn., have lost half or more of their workers, according to agency data.



## POLITICS

### Judge orders new limits on DOGE data access at Social Security Administration

"The impact on those offices in particular is going to be significant, where you are going to see waiting times for visitors, including those who have appointments, go up exponentially," Couture said.

The office in the city of Wisconsin Rapids has lost more than 58% of its staff. LaPointe, whose field office is 100 miles south, says massive losses in one office often affect nearby sites.

"That office then takes the work and moves it to the surrounding offices, the surrounding areas and then throughout the region and even then nationwide to get help," LaPointe said. "So every office is overburdened, short-staffed with public demand."

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Sponsor Message

## **Trump promised no cuts to benefits, but advocates say service cuts affect benefits**

The Trump administration has routinely pledged not to cut Social Security benefits, while simultaneously cutting waste and fraud from the program.

"President Trump has promised to protect Americans' hard-earned Social Security benefits so that all eligible individuals can access them," Lee Dudek, the acting commissioner of Social Security, said in a statement recently.

But SSA workers and advocates for older and disabled Americans say these staff cuts — as well as controversial agency moves under Dudek's leadership — amount to a cut to services.

"The cut to the program is the deterioration of staff," LaPointe said. "That is the backdoor cut to the program because benefits delayed are benefits denied."

According to the agency's own performance data, there has been a significant increase in wait times for phone services since President Trump was elected.



### ECONOMY

#### **Trump administration changes course on in-person requirements for Social Security**

Last year the average wait time for phone services was about an hour. So far this year, it's more than an hour and a half. At the same time, the number of people calling in to the agency has skyrocketed. In November of last year, roughly 6.5

million calls were received by the SSA that month. Last month, the agency received 10.4 million calls.

Much of the increase in call volume, LaPointe said, is due to "confusion and fear" created by the administration. Some of that concern, she said, was a result of recently announced anti-fraud measures, as well as stories of some beneficiaries being erroneously classified as dead. She said she also saw an uptick in calls after Commerce Secretary Howard Lutnick suggested that only a "fraudster" would complain if they missed a Social Security check.

"People started to come in just to verify their identity [and] that they're alive," LaPointe said, "that they're associated with their account [and] to let us know they do need their money."

## **Reassignments and retirements**

It's expected many of the lost field office employees will be replaced by staff who were working at the agency's headquarters or one of the regional offices. One of the Trump administration's plans is to cut down the number of regional offices — which provide IT and human resources to the field offices — from 10 to four, and then retrain some workers who "volunteered" to be reassigned to public-facing roles.

"SSA offered all employees the opportunity to volunteer to be reassigned from a non-mission critical position to a local field office, teleservice center, processing

center, payment center, workload support unit, or hearing office," the agency says. More than 2,000 employees have volunteered for a reassignment.

Couture said the union, however, has not heard any "well-developed plan for ensuring that there was orderly knowledge transfer" as people are placed in those roles.

Laura Haltzel was the former associate commissioner for the SSA's Office of Research, Evaluation and Statistics in the agency's Maryland headquarters. Rather than volunteer for reassignment and face more uncertainty, she decided to take an offer of early retirement.

Haltzel said there are problems with the expectation that workers in roles like hers would be able to quickly jump in and replace the thousands of frontline workers that have left. She called the plan a "sort of mythical idea."



## POLITICS

### **Fired, rehired and fired again: Some federal workers find they're suddenly uninsured**

"We've lost an extreme amount of expertise and knowledge that we simply are not going to get back," she said. "Let's say somebody in my team, who is a statistician, [you] suddenly turn them into a claims processor. It takes two years of training for someone to become proficient at taking a Social Security claim because of the complexity of the law. That is not something that you can simply plug somebody into overnight and keep up at the same pace as it had been operating previously."

And to meet the overall staffing goal, agency officials are urging more workers in "non-critical roles" at headquarters to consider the deferred resignation program.

But Haltzel said it's an open question whether many of these workers will want to leave, despite the pressure.

"People are taking reassessments out of fear that they will have no jobs because the entire economy in the D.C. area now is affected by a loss of employment across the federal landscape," she said. "And for all of these individuals to find new jobs in the private sector, that's simply not a reality, particularly from the Social Security Administration, for which there is no private equivalent."

A spokesperson for Social Security told NPR in a statement that the agency "has implemented its workforce optimization plan that focuses on reducing employees in non-mission-critical positions and bolstering staff in mission-critical roles" and that officials will "continue to monitor progress" of the staff reductions as they continue throughout the fiscal year.

Haltzel said she's deeply concerned about the loss of expertise that has left the SSA in recent weeks. She said her former team, which analyzed whether the agency was doing a good job serving beneficiaries, has been cut by more than half.

"I hope that we're able to sustain a basic minimum of knowledge in order to maintain the functioning of the agency," Haltzel said. "But frankly, given that they have no control over who takes the reassessments and who simply retires and leaves, they could lose individuals where we are one person deep in knowledge. And once that knowledge is gone, it is gone. These people will not come back."

# Exhibit D

DJIA 40227.59 0.28% ↑ S&P 500 5528.75 0.06% ↑ Nasdaq 17366.13 -0.10% ↓ VIX 25.15 < >

# Social Security says it's only closing one field office. So what about the 22 leases that were terminated?

The so-called Department of Government Efficiency's 'wall of receipts' mentions numerous Social Security lease terminations

By Alessandra Malito [Follow](#)

Published: March 29, 2025 at 9:00 a.m. ET



The Social Security Administration says news that it is closing more than one field office is inaccurate — but it hasn't clarified the various types of SSA properties with leases that "DOGE" is terminating.

PHOTO: GETTY IMAGES

The Social Security Administration has said it is only permanently closing one hearing office — in White Plains, N.Y. — and that news of any other such closures is "false."

In a statement issued late Thursday "correcting the record," the agency said any reports of it permanently closing more local field offices were inaccurate. The problem, however, is the lack of clarity over dozens of other Social Security Administration properties listed with lease terminations on the so-called Department of Government Efficiency's website, which lists savings of anywhere from hundreds of thousands of dollars to zero.

There are other types of SSA offices closing, such as underutilized office spaces and small hearing rooms, the agency said.

Still, the "DOGE" website, listing its savings strategies and the "[wall of receipts](#)" for those savings, includes 22 Social Security lease terminations as of Thursday. The list does not specify what type of office space is being terminated, such as a field office versus a hearing room. "Since most hearings are held virtually, SSA no longer needs these underutilized rooms," the SSA said in its announcement.

Local field offices — for some beneficiaries, one of the most important offices to keep open because of a lack of internet access or comfort using the web — were at the heart of the agency's message.

**Opinion:** [Musk's Fox interview raises new questions about the 'DOGE' impact on Social Security](#)

The Social Security Administration has not permanently closed or announced permanent closures of any field offices since Jan. 1, the agency said in its statement. There are times, however, when it must close an office temporarily because of "weather, damage, or facilities issues." The SSA works with local congressional delegations before any permanent closures, it added.

"SSA is committed to providing service where people need help and our local field offices are no exception," Leland Dudek, SSA's acting commissioner, said in a statement. "We have not permanently closed any local field offices this year."

The announcement came days after the Senate confirmation hearing for President Trump's nominee for Social Security Administration commissioner, [Frank Bisignano](#), during which senators discussed field-office closures. Some senators asked Bisignano to confirm he would not close any field offices in their states, though the nominee said he could not do so until he was in the position to analyze the situation.

The SSA has said multiple times it wants to provide beneficiaries more clarity, but experts say the latest office-reduction announcements have not been clear. The list of lease terminations on DOGE's website, for example, includes total savings, annual lease costs and square footage for most of the properties. But nine of the 22 SSA properties, including the White Plains, N.Y., office, are listed as having a total of \$0 in savings as of Thursday evening.

At one point, there were more offices on the list, according to a recent Brookings Institution report, which mentioned [47 offices](#) slated to close.

The latest announcement doesn't appear to align with what DOGE has said previously about saving money through lease terminations. "Elon Musk's DOGE bragged about savings from closing Social Security field offices," said Nancy Altman, president of Social Security Works. "The Trump administration, oblivious about how important these offices are, was unprepared for the outcry, and forced to scramble."

The agency's statement was also "deceptively worded," according to Altman. "The release very carefully states that the Social Security Administration is not closing offices," she said. "What it omits is that it is the General Services Administration that contracts with landlords. The GSA has been instructed to close every office. Historically, GSA consults with the affected agency. But in an unprecedented move, GSA has cut SSA out of the loop." In February, the GSA was ordered to begin terminating the leases of about 7,500 federal offices across the country, the Associated Press [reported](#).

The agency should be able to make changes when necessary, but the way in which it has done so lately has been hard to discern, said Maria Freese, senior Social Security expert at the National Committee to Preserve Social Security and Medicare. "As an organization, we don't take the position to never make changes at SSA," she said. "But there needs to be a plan to do that — some analysis of where the needs are, what your availability is to serve those needs. None of that has happened with this administration."

SSA and DOGE did not immediately respond to a request for comment on the types of office closures, or why nearly half of the properties show \$0 in savings.

This is the latest announcement the SSA has made to clarify some of its actions over the past month and a half.

Earlier this week, the SSA said it was increasing its [transparency](#) and accountability, including sharing agency actions and its weekly operational-report meetings online for people to watch. A few days later, the agency said it had [reassessed](#) its new rule for identification verification, which had previously stated all ID proofing must be done online or in person instead of over the phone. The SSA said certain individuals, including those applying for Medicare, disability and SSI, would be allowed to continue to verify their identity on the phone.

**Read on:**

[‘DOGE’ operative named chief information officer at Social Security Administration: report](#)

[‘DOGE person’ Frank Bisignano faces confirmation hearing to lead Social Security](#)

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## About the Author

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